UNITED STATES DISTRICT COURT DISTRICT OF SOUTH DAKOTA SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR 21-40136

Plaintiff,

REDACTED INDICTMENT

VS.

Conspiracy to Obtain Controlled Substances by Fraud

HAKEEM MOHAMED, ZEKKI KEMAL, and WARSAME JAMA,

21 U.S.C. §§ 843(a)(3) and 846

Defendants.

The Grand Jury charges:

Beginning at an unknown date and continuing to on or about December 22, 2020, in the District of South Dakota and elsewhere, the defendants, Hakeem Mohamed, Zekki Kemal, and Warsame Jama, did knowingly and intentionally combine, conspire, confederate, and agree together, with others known and unknown to the Grand Jury, to knowingly and intentionally acquire and obtain possession of controlled substances, namely promethazine with codeine syrup, a Schedule V controlled substance; and oxycodone, a Schedule II controlled substance; by misrepresentation, fraud, forgery, deception, and subterfuge, all in violation of 21 U.S.C. §§ 843(a)(3) and 846.

A TRUE BILL:

NAME REDACTED

Foreperson

DENNIS R. HOLMES
Acting United States Attorney

By: Sthe for